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(714) 667-3700

December 14, 1994

J. Michael Batten
Converse Consultants-Orange County
15245 Alton Parkway, Suite 100
Irvine, CA 92718-2307

Subject: Additional Site Characterization

Re: Fullerton Business Park North
1551 East Orangethorpe Avenue
Fullerton, CA 92632
O.C.H.C.A. Case # 94IC29

Dear Mr. Batten:

Please be advised that this Agency has reviewed the result of the subject characterization. This consisted of the installation on December 2, 1994 of seven (7) geoprobe borings and the collection of several soil samples for PCE analysis.

Laboratory results showed that the PCE plume in the soil extends further to the north and west of the former clarifier, and downwards to at least 30 feet below the ground surface. The elevated levels of PCE in soil prompted this Agency to estimate the degree of public health threat posed by PCE in the subsurface, using the simplified vapor diffusion model. The result indicated an excess lifetime cancer risk (ELCR) greater than the acceptable $1 \text{ E-}06$ level. In view of this, as well as the possible threat the contaminated soil may pose to water quality, the former cannot be allowed to be left in place unless remediated to such level as to be below the acceptable ELCR level, or removed and properly treated or disposed of.

In this regard, you are requested to submit to this office a work plan for delineating the full lateral and vertical extent of this contamination for review. Upon completion of this phase of the investigation, a Remedial Action Plan (RAP) will also be required for review and approval prior to implementation.

As had earlier been discussed with you, groundwater investigation is being required by the Santa Ana Regional Water Quality Control Board (SARWQCB) for this site.. A work plan for the same also needs to be submitted to the SARWQCB for review and concurrence.

If you have any questions, please call me at (714) 667-3717.

Sincerely,

A handwritten signature in black ink, appearing to read 'Luis Lodrigueza', with a stylized flourish at the end.

Luis Lodrigueza
Hazardous Waste Specialist
Hazardous Materials Management Section
Environmental Health Division

LL:ll

cc: Robert Holub, Santa Ana Regional Water Quality Control Board
Carl Ross, Red Eagle Properties, Ltd.